¹Brandon Green 56400-054

Pro Se, Defendant

MDC Brooklyn

PO Box 329002

Brooklyn, NY 11232

To: Farrance Tandis

United States Probation Officer

500 Pearl Street

New York, NY 10007

Cc: Hon. Judge Paul G. Gardephe (U.S.D.J.), Unites States Attorney's Office, and The Department of Justice;

Date: February 16, 2021

Re: U.S. v. Green (Case No. 16-CR-281-001)

ADDENDUM (A) TO THE PRESENTENCE REPORT (PSR) DOCUMENT

TO THE FILED "ADDENDUM REPORT" DATED: 4/28/2020

OBJECTIONS - Fundamentally objecting to the entire PSR and by the process in which the Probation Department drafted it (Guidelines, Criminal History, Category) (Pursuant to U.S.S.G. Section 4A1.1, Application Note 2, and 4A1.2(d)(2), because the sentence was imposed for an offense committed prior to the defendant's 18th birthday and the defendant was not confined within the (5) five-year period to allegedly committing the instant offense, no points should be added.

By Brandon Green

Due to constitutional deficient performance of Mr. Green's trial attorney(s), and, by the failures of all of Mr. Green's lawyer(s) that represented him in this case not adequately explaining, going over, investigating, challenging and/or objecting to, inter alia, the Presentence Report (PSR)¹, ²; the government and the Courts were allowed to further the crimes and violations of Mr. Green's rights here; by allowing Probation Officer Tandis to generate an unfair, bias, and partial "PSR" after Mr. Green's lawyer(s) colluded with the Government and the Court to wrongfully convict him. This "PSR" is a prime product of the Government's malicious and vindictive acts and/or the prejudice(s) that Mr. Green has suffered from since the creation of this fabricated case. These violations of Mr. Green's Constitutional, Civil and most basic human rights have occurred at all stages of the proceedings, from the beginning of the case to during and after trial, he has suffered a complete breakdown in the Administration of Justice, to include, but not limited to IAC, prosecutorial, judicial and Government misconduct among other similar related violations, and/or federal, state and local crimes that took place here, and are still continuing to do so;

Furthermore, not only were my God-given human and most basic of Civil rights violated, but several New York State, and Federal Laws were violated as well. These illegal acts were carried out not only by those responsible for protecting and defending Mr. Green's rights (i.e. his previous attorney(s)), but were also committed by all of those charged with the healthy administration of justice to include the District Court, Probation Department, and the U.S. Attorney's Office for the Southern District of New York. What took place here was a conspiracy by all of YOU to deprive Mr. Green and his co-defendant(s) of a fair trial; and this was done to ensure the imprisonment of, inter alios and in particular, the alleged

¹ Please note that this Addendum is being documented with this Court solely for the purposes of memorializing such for later appeals, and/or post-conviction, and/other judicial and/or quasi-judicial proceedings. Specifically, he asks that the District Court judge, the Honorable Judge Paul G. Gardpehe, (hereafter the "Judge"), not take any action whatsoever on this document. Moreover, because Mr. Green has an Affidavit and Motion to Recuse (hereafter the "Recusal Pleadings" pending before the Judge, he does not want the Judge to construe this document in any way as asking for any type of relief from this Court, as doing so would be contrary to the position taken in his Recusal Pleadings (i.e. the Judge is partial) and he does not want that to happen. Furthermore, if Mr. Green later needs to move for any type of relief form this District Court regarding this addendum and moreover the issues contained herein, he will then do so after a different judge has been assigned to hear these proceedings following the Judges recusal. Mr. Green PRAYS the Honorable Judge Paul G. Gardephe will answer his recusal motion in a timely manner (before sentencing), so he is afforded a fair right to appeal the District Courts decisions to the Second Circuit, and, he wishes to ask the Court of Appeals (2nd Cir.) to issue him a STAY in these proceedings, and not allow the District Court judge Paul G. Gardephe to pass a bias/partial sentence against him, until the motion to recuse is decided by a fair tribunal, for the District Court to do otherwise would be a continuing clear abuse of discretion.

² This is a text message between Mr. Breslin and Mr. Green discussing the presentence report. This text message is self-explanatory and further supports Mr. Green's contentions that his previous attorney(s) conspired with the government, the probation department and the Court at all stages of these proceedings, to assist in wrongfully convict him. This "PSR" was not an independent/impartial proceeding(s) process. Moreover, this text message between Mr. Green and Mr. Breslin basically shows that this report was generated to ONLY support the government's views. As Mr. Breslin stated this himself, "The report contains a section with the government view, they gave this to her, and she is repeating it. This is how it works." (quoting the text message between Mr. Green and Mr. Breslin, dated 7/16/2019, marked as "exhibit D").

leader and alleged found of the Blood Hounds Brims, Latique Johnson. That was the primary motive behind the crimes against my rights. This case is the quintessential example of what happens when overzealous government officials employ an end to justify the means strategy to prosecute those suspected of criminal wrongdoing(s). However, this is illegal, and only caused more problems than it solves (which this case is a prime example of).

This case is loaded with problems, and it was and is flawed at its conception; it was not brought in good faith, nor with clean hands. Moreover, the case against Mr. Green here would have never made it to trial; and, although it did, he never should have been found guilty; and none of this would have happened had his attorney(s) done their jobs, and moreover stood up for, protected and defended Mr. Green's God- given, most basic human and Civil rights. The failures of his attorney(s) in these regards severely prejudiced such rights, to inter alia, a fair and impartial investigation of Mr. Green's "PSR".

Mr. Green contends that had his attorney(s) done much more to ensure that his rights were protected, and that he was not illegally prosecuted, and wrongfully convicted; however, we all know that this was never going to happen here; as long as the Government had it their way- their case against Mr. Green and the other defendant(s) was but a mere formality in their efforts to imprison us (and in particular, Mr. Johnson). Moreover, if the Court and Government officials could have gotten away with it, the Government would have just picked us up off the streets and send us straight to prison, without any kind of trial or other adversarial proceedings. Unfortunately, for them they had to at least make it appear as though there was some sense of justice involved in their prosecution of us. In fact, what took place here reminds me of a quote I once read, to-wit, "Trial by jury itself, instead of being a security to persons who are accused, will be a delusion, a mockery and a snare." (Quoting Lord Denman 1779-1854, judgement in O'Connell v. the Queen, 4 Sept. 1844.) And this is exactly what took place here!

Mr. Green has maintained his innocence to everyone involved in this case, including but not limited to, all of his attorneys that represented him in this case. Mr. Green contends that there was NO evidence at trial or any other time in this case, that can support this unfair and bias generated "PSR" (pre-sentencing report) and wishes for this entire pre-sentencing report to be stricken from the record;

Paragraph 1-8, 10-15- Objects Mr. Green states that trial counsel was ineffective for not challenging, inter alia, the defective indictment(s);

Paragraph 16-23: Respectfully OBJECTS

Paragraph 17: Objects.

Paragraph 18, 19: Objects - (TT PG. 160, 161, 164, 167, 192, 195, 199, 200, 204, 210, 212, 215, 310, 543, 668, 827, 1275, 2170, 2171, 2174, 2178). Mr. Green's objections as a general matter of the functioning of the gang; Mr. Green further OBJECTS stating: this was not a commission body case, not one single government witnesse(s) testified to these "nine alleged godfathers" who formed the NYBBA, and/or the leaders of each BHB "pedigree" who made up this commission body who sanction the approvals of each set or pedigree within itself, a disciplinary board (Who ordered alleged hits and/or internal sanctions); (TT PG. 160) CW-Adams testified there were "16 pedigrees apart of the BHB", but could not name all of the godfathers from each of these pedigrees, neither did the government have all "16" BHB pedigrees in their summary charts that they used at trial; (TT PG. 165) nor did a single cooperator testify to each alleged godfathers of each these pedigree that helped function illegal activities and gang functions, kitty dues, communications (that disseminated gang mythology) and of hierarchy. Every government cooperating witness testified that when the godfather was in jail, the acting god father would run the gang, on the contrary every government witness stated they were the alleged acting god father(s) while Mr. Johnson was on the streets (TT PG. 174,168, 819, 844,1033 2908); CW-Adams testified about alleged BHB literature that was given to him/seized in the BOP, but couldn't remember who provided it (TT PG. 202); CW-Adams was the only government witness to testify to BHB having tracking numbers to identify each of its members (Tt 423); trial counsel(s) were ineffective for not arguing for a multiple conspiracy jury instruction, for not calling a gang expert to corroborate these inner workings of the gang(s)/pedigrees, due to the conflictions and contradicting testimony between ALL of the government witnesses. For example, CW-Adams stated that O-Dog (Saeed Kaid) was allegedly disciplined by underlings apart of the Greyhound while he was allegedly the godfather of the pedigree/set. (TT PG. 310, 312)

The Court: I'm sorry. Let me just break in for a second. When you use the term, "set," what does that mean, "set"?

The Witness: It's like a branch off another hood, another set.

Adams Further states the Grey Hound is the Harlem set.. (TT PG. 161, 195)

Q. Do you see where it says, "death to all those who go against the set"?

A. Yes.

The Court: Well, you used the term "set", what does "set" mean? What's a set?

The Witness: That's Blood Hound Brim. (TT PG. 161)

Mr. Adams stated he was Grey Hound because he was from Harlem, but this is highly contradicting because all of the government witnesses (mostly Greyhound members) claim to have had members in different states and different boroughs in the New York area that were not just from Harlem apart of the Greyhound.

CW-Rosarioⁱⁱ (TT PG 2908) at trial stated:

Q. Who's Measy (CW-Adams)?

A. He was a Blood Hound Brim as well. He had the-- he was the god father for the Grey Hound right before I came home in 2011.

Further testifying to the fact that the two pedigrees Bronx (220) and Harlem (Greyhound) did not have any casual connection (TT PG. 3075):

Q. Never met him (him-meaning Donnell Murray) at a single pow-wow, correct?

A. I was in the GREYHOUND (Harlem). I didn't go to pow-wows with them (them-meaning 220/Bronx members); they didn't go to pow-wows with us. We was under different pedigrees (sets).

CW-Adams further stating (TT PG. 212,543, 687): that "AK was still disciplined by us even though he was not BHB". Further stating when he left 59 to BHB, he did not hood hop (meaning-switch sets). Further stating (TT PG. 310) that the word "set" means another section of the Brims. This proves allegedly the Greyhound was its own set. For example, Adams stated: (TT PG. 167)

Q. Were you the high 020 of the whole gang?

A. No, I was the high 020 Greyhound.

Q. What is the Greyhound?

A. It's the Harlem set. (TT PG. 668)

Q. And he was a different set than BHB?

A. No, he was a "different Brim set." ** get the testimony that he stating to the COURTS that Greyhound is the Harlem sets

CW-Morton (TT PG. 836-37) stated he was a part of BHB until 2011 and pedigrees was not a part of BHB; and, that there was a difference between a BHB and a brim sign; (TT PG. 806)

Q. Were pedigrees also apart of BHB?

A. No.

Morton went on to state (TT. PG 827) "If you are put on the "wall" (wall-meaning plate), that's another way a gang member could violate you they supposed to violate you."

CW-Moore (TT PG. 2170)

Q. What's a 59?

A. It's a fight between two blood members.

The defendant moves to amend his dispute by adding to paragraph(s) 24 and 25 of his objection(s) statement already filed. Mr. Green contends that he was neither a member nor a "Godfather" of the BHB (See Bureau of Prisons gang data base from the years of 2004 to 2010; which support Mr. Green contentions).

Paragraph 24, 25: Respectfully OBJECTS and add additional facts - Defendant attaches Exhibit A, an email communication/exchange dated 6/13/2019 between the United Attorney's Office and The Federal Probation Department^{III}, THAT DID NOT INCLUDE DEFENSE COUNSEL (counsels Mr. Breslin and Ms. Geller, who for some reason failed to object to this ex-parte communication(s) and allowed Mr. Green rights to be further violated), highlighting the creation and implementation of false information (See attached Exhibit B; trial transcript pages 424, 425 and 426). This information, if not challenged by the defendant, was placed to severally prejudice and taint the defendant on his PSR. It establishes clearly and crisply, the perpetual attempts deployed by the U.S. Attorney's to prosecute predatorily^{IV} and maliciously by relaying false, unverified and inaccurate information(s) to Probation for the purpose of misrepresenting the defendant and painting him in a bad light. The defendant claims that the "PSR" is riddled with these fake allegations to impact his criminal history calculations. The information is contrary to the reporting(s) as evidence by the BOP (bureau of prisons) gang files. Defendant moves for this information and all other relevant citations to the record that the Probation Department relied on in support of the factual assertions or legal determinations reflected in the entire "PSR" provided by the Government that's unsupported of the record redacted.

Paragraph 30, 75, 82 - Mr. Green OBJECTS and attaches Exhibit C, a copy of the August 3, 2010 traffic stop "disposition" showing that this arrest was dismissed because of Constitutional violations; With that said Mr. Green moves the Probation Department to remove/redact all citations in the PSR discussing any and everything associated with the August 3, 2010 Traffic Stop. The August 3, 2010 "two" arrest reports and the Government's own 302's, and/or Officer Jeffrey Sisco's personal memo book shows he committed perjury and that the government suborned such perjury, to mislead Mr. Green's jury into thinking he lived at and sold drugs out of the "Honeywell" complexes.

Paragraph 30, 32; Mr. Green Wishes to cite this case in support of the his argument to the probation department for trying to enhance him for allegedly escaping out of the halfway house: 8th Circuit United States v. Little, (No. 19-2729)(8th Cir. June 9, 2020) where the government charged defendant escaped from custody when he was late in reporting to his halfway house. Like Little, Mr. Green was also only 4 hours late to reporting to his halfway house - due to this August 3, 2010 false arrest and police brutality of Officer Jeffrey Sisco and other NYPD police officers. The evidence in Little was not enough to support his conviction for escape from custody in violation of 18 U.S.C. Sec. 751(a), as there was no evidence in the record that Mr. Green willing fully failed to call or arrive at his halfway house on time.

Paragraph 33: OBJECTS - To the illegal traffic stop of Ms. Turcios. and the illegal entry, and search and seizure of the alleged items found in the Bridgeport, CT residence Mr. Green was arrested at. Mr. Green wishes to add and show why such searches was illegal; by citing relevant testimony from agents that participated in this illegal search. Which Mr. Green's lawyers over his objections failed to address. For example;

Proves that Ms. Turcios withdrew any type of oral consent - after she entered her home. Agent Armaladas testimony proves this:

a) U.S. Marshall Armaladas at the suppression hearing stated: When Ms. Turcios walked in the apartment Brandon Green yelled to her to" let them search." Which confirms Ms. Turcios never gave any oral consent, but for argument sake, if she did give any oral consent, such consent was withdrew after she entered her apartment.

U.S. Marshall Kushi's testimony supports Mr. Green's contentions, that Ms. Turcios did not give any type of consent until she was taken upstairs, shown these firearms (threaten with arrest of the pink firearm), and then taken unto her "bedrooms balcony" (the balcony that overlooks the front of the apartment); Supp. TT PP 202:

A. I was not at the time -- I was not aware of what was upstairs, but I did know that it was a two-floor apartment style town house.

Deputy Kushi went on (Supp. PG. 212):

A. at that point I was only upstairs with her for the brief moment. I just brought her upstairs to kinda of "let her see" what was going on and a short time after I retrieve a document that I would go over with her --

Now, AUSA Mr. Clore then realizes that Marshall Deputy Kushi just stated he brought Ms. Turcios upstairs where the firearms were laid out across her bed, on her bedroom's "balcony" that faces the front of the house, before she gave any consent at all to search. (Supp.. pg 210). The firearms were laid out on the bed already, among which was a women's pink gripped handgun. The Officers used this imagery to coerce her into giving them permission to search, AFTER THEY HAD ALREADY DONE SO ILLEGALLY.

Q. What do you mean by balcony?

A. And up that staircase was a small balcony that was in front of the apartment.

Clearly, review of the transcripts from the suppression hearing shows that the Officers involved secured Mr. Green's person at the front door--so, they had no valid legal reason to enter the premises to illegally search the home under the pretext that it was a "protective sweep":

Q. What happened when you entered the apartment?

A. I didn't physically enter the apartment at the time. I know that when we slowly made entry into the apartment, Brandon Green was seen coming down the stairs towards law enforcement commands. We were instructing him to come towards -- to come towards the FRONT DOOR of the dwelling of the apartment.

TT Pg. 202. (Emphasis Added). The prosecutor then realizes that the Marshall just established that they never entered the apartment before placing Mr. Green under arrest; that he was out of the front door. So, to clean up this, the Prosecutor leads the Marshall Kushi to testify differently:

Q. WHAT DO YOU MEAN you DIDN'T MAKE ENTRY at the time?

A. I'm sorry. We made entry into the apartment, but we didn't physically go further into the apartment because we could see Brandon Green coming towards the front door of the residence.

TT Pg. 203 (Emphasis Added). Marshall Kushi obviously altered his previous testimony when prompted by the Prosecutor; and you can see proof of this in his lies: After changing his testimony to reflect that they entered the apartment, he claims to still see Mr. Green coming towards the front door. Marshall Kushi makes the mistake of telling a lie, while still trying to recall the details as he remembered them in his head.

United States Marshall Kamrowski never testified that there was any currency in the closet that these alleged firearms were found in. His testimony also reflects that Ms. Turcios was taken up to the second floor bedroom out to the balcony before any type of consent was given, this was in fact coercive because these firearms were laid out on her bed and/or a ledge in her room prior to her being brought upstairs; (Supp. pg 89):

- Q. Deputy Kamrowski, I am showing you what has been marked for identification as Government Exhibit 24. Do you recognize this?
- A. Yes.
- Q. What is it?
- A. This is the apartment complex we went to that day.
- Q. How do you know that?
- A. I remember specifically, like, the BALCONY, the steps, how it was laid out.

Deputy Marshall Kamrowski further testifies that he was cautious about someone being on that BALCONY when agents entered the apartment; (Supp. pg 100):

Q. Can you describe how the marshall entered the apartment?

A. Looking at the apartment, you had to go up a set of stairs to get up there. So, we made our way up there, but we were pretty cautious because there was a BALCONY on top and then there was another BALCONY for the main door. So, we had two balconies that we had to keep a lookout for as we were making our way to the building.

Marshall Kamrowski goes on to states Ms. Turcios Was Upstairs in Her Bedroom when she gave that consent; (Supp. pg 106 - 107):

- Q. What did you observe her doing while she was on the first floor of the apartment?
- A. When I went back in the apartment?
- Q. Did you go back in?
- A. Yeah. I went back in a few minute later. At that point, I think she was UPSTAIRS IN THE BEDROOM when I went back in the apartment.
- Q. What happened when you came back in?

A. At that point other individuals were talking to her, and I believe one of the other deputies had stated she had given consent to search the apartment.

TR

Q. Where did you search?

A. I started downstairs in the bathroom area, the kitchen, and then at some point I made my way up to the bedroom as well.

Q. Then what happened?

A. The woman was sitting on the bed while others were searching. She was kind of conversing back and forth with everyone.

Paragraph 95: Defendant further wishes to report misconduct by the United States Attorney's Office and The Federal Probation Department *. After a visit by Federal Probation Officer Tandis Farrence on or around April 24, 2019, Mr. Green was asked about his family background. He disclosed that his daughters' mother was employed by the NYPD for the last ten years approximately, and her name is "Jameelah Branch." Upon the PSR generation and it's electronic filing by the government; Miss Branch was selectively harassed and ridiculed by supervisors and members of her department. Subsequently, she was forced to resign from her position at the NYPD, days after Mr. Green's Presentencing report was electronically filed on October 8, 2019.

The defendant moves for this Addendum (A) to the Presentence Report with its attached exhibits, to be entered by this Honorable Court.

Best Regards,

Brandon Green, Reg No. 56400-054

Defendant, Pro Se

¹ Mr. Green is/was labeled a "high risk" inmate for contracting this deadly virus, COVID 19. For nearly 1 (one) year, Mr. Green was the head orderly/kitchen orderly in the MDC (Metropolitan Detention Center) Brooklyn's G-41 quarantine unit; Regardless of his health issues, the institution still allowed Mr. Green to be placed under the most harsh conditions one could ever imagine; in the most "high risk" environment inside the entire facility. See EXHIBIT

E; a letter of recommendation from Counselor Vega, the same counsel on the 4th floor where the government is alleging the slashing took place.

"Upon speaking with Mr. Witzel, Mr. Green assets that cooperating Manuel Rosario has been charged with new criminal conduct. If this is true, Mr. Green submits that the Government has Brady/Giglio obligations to provide any details and information pertaining to any such new criminal conduct, given the significant role that cooperator testimony plays with respect to Mr. Green's case.

Exhibit A depicts an email proving the extent the government would go to convict Mr. Green. (a) On or around June 13, 2019 at 10:48 am, Federal Probation Officer Tandis Farrence sent an email to AUSA Ms. Feinstein which stated among other things: "Hello, can you please confirm for me when Green commenced his role in the offense? It may have an impact on his criminal history calculations. Thanks. and (b) shows on or about June 13, 2019 at 11:22am AUSA Ms. Allison Nichols responded to Probation Officer Tandis email stating: "Green joined BHB when he was in federal prison at some time between 2006 to 2010. He eventually rose to the rank of acting godfather for the feds, the highest rank for the branch of the gang in the federal prison system." We don't have an exact year. Mr. Green has (9) separate emails/text messages between him and trial counsel, attorneys Eric R. Breslin and Melissa S. Geller from the Law Firm of Duane Morris, asking them among other things, "From hearing trial testimony and from combing thoroughly through the trial transcripts, when do you see me allegedly entering this conspiracy? And/or when is the Government alleging that I commenced my role in this offense?" Nevertheless, Mr. Breslin and Ms. Geller both gave Mr. Green over a half dozen different answers pertaining to his one simple question. See, EXHIBIT F; 1 of 9 emails/text messages between Mr. Green and trial attorneys both Mr. Breslin and Ms. Geller dated: 6/17/19, 6/18/19, 6/20/19, 6/22/19.

Exhibit 2 - Shows that the Government knew or should have known that Mr. Green was not the acting Godfather for the feds; they had allegedly seized gang paperwork (Shown at trial - Gov. Exhibit 170), authenticated by a BHB Member and Government witness Michael Adams, which shows that Mr. Green was not the acting Godfather of the Feds:

Q. And what is listed here?A. It's the lineup.Q. The lineup for what?A. The feds.

TT. PG. 425 LL 4 -7.

THE COURT: And what is the feds? THE WITNESS: Federal penitentiary.

ld. at LL 24-25.

THE COURT: So, there was a lineup for members who are in the federal penitentiary?

THE WITNESS: Correct.

THE COURT: Which one? Which federal penitentiary?

THE WITNESS: All of them.

Id. Pg. 426 LL 1-5.

Q. Do you see where it says "GF"?

A. Yes.

Q. What does that mean?

A. Godfather.

.

Q. The rest of the items listed here, what are they all?

A. That's the Chain of Command.

Q. And what is that next to GF?

A. T Mob.

Q. Do you know who T Mob was? A. Yeah.

ld. Pg. 425 LL 8-22.

Clearly this shows that Mr. Green was not the acting Godfather, nor a member of the BHB, but, yet the Assistant United States Office still misinformed the Probation Department here by sending them false information that they knew not to be correct. So, such would have a prejudicial impact in his criminal history calculations.

While incarcerated at MDC, on several occasions I've been visited by SIS Parker, and others, at which time Mr. Parker tried to force me to sign a document saying I was a member of BHB; and, when that did not work, he tried to threaten me by bringing Mr. Johnson downstairs and for me to deny all affiliations in his presence. And, when that did not work, he tried - unsuccessfully - to get me to admit that I was an associate of BHB and its members. It should be noted that Ms. Arceneaux suffered the same fate, after she sent a letter to Court, and the trial transcripts were filed and uploaded to the docket on April 4, 2019 (TT pg 4, where the Courts discuss her letter); Ms. Arceneaux was fired from her job two weeks later.

EXHIBIT B

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Case 1:16-cr-00281-PGG Document 1003 Filed 05/28/21 Page 14 of 42
                                Adams - Direct
      J2p2joh4
1
      Α.
          No.
          Do you see where it says "jet manual"?
2
      Q.
      Α.
3
          Yes.
          What is a jet manual?
 4
      Q.
          Exactly what it is, the manual for the jet.
5
      Α.
          And what is the jet again?
6
          Blood Hound Brim.
 7
      Α.
               MS. FEINSTEIN: Okay. If we could magnify the right
 8
      side, far right side of the page.
 9
10
      BY MS. FEINSTEIN:
          Mr. Adams, can you read what's written here?
11
      Q.
                MS. FEINSTEIN: Actually, I'm sorry. Strike that.
12
          Mr. Adams, do you see where it says "Chairman Mao"?
13
      Q.
          Yes.
14
      Α.
          What does Chairman Mao mean?
15
      Q.
16
      Α.
          La.
          Do you see where it says G-5?
17
      Q.
18
      Α.
          Yeah.
          What is G-5?
19
      0.
          Hound.
20
      Α.
          Do you recognize "the L.U."?
21
      Q.
```

Q. What is the lineup again?

The lineup.

What does that stand for?

Yes.

Α.

Q.

Α.

22

23

24

25

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J2p2joh4
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Adams - Direct

- 1 | A. Chain of command.
- 2 | Q. And what is listed here?
 - A. I don't understand.
- 4 Q. Can you describe what is listed here.
- 5 | A. It's the lineup.
- 6 | Q. The lineup for what?
- 7 A. For the feds.
- 8 | Q. Do you see where it says "GF"?
- 9 | A. Yes.

3

- 10 | Q. What does that mean?
- 11 | A. Godfather.
- 12 | Q. Do you see where it says "high"?
- 13 A. Yes.
- 14 | Q. What does that mean?
- 15 | A. High O2O.
- 16 | Q. The rest of the items listed here, what are they all?
- 17 | A. That's the chain of command.
- 18 | Q. And what is it that is next to GF?
- 19 | A. T Mob.
- 20 | Q. Do you know who T Mob was?
- 21 A. Yeah.
- 22 | O. Who was that?
- 23 | A. It was La codefendant on his first fed case.
- 24 | THE COURT: And what is the fed?
- 25 | THE WITNESS: Federal penitentiary.

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J2p2joh4
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Adams - Direct

THE COURT: So there was a lineup for members who are 1 in the federal penitentiary? 2 THE WITNESS: Correct. 3 THE COURT: Which one? Which federal penitentiary? 4 THE WITNESS: All of them. 5 THE COURT: All of them. All right. Go ahead. 6 MS. FEINSTEIN: Thank you. 7 I would like to zoom in on the left side. I'm sorry, 8 can we go back to the right side of the screen? 9 BY MS. FEINSTEIN: 10 See where it says 4? Can you read that next to 4? 11 Yeah. 12 Α. What does it say? 13 0. Scramz and Flow. 14 Α. Do you know who Scramz or Flow were? 15 Q. 16 Α. No. Let's look at the left side, top left side of the paper. 17 Q. Do you see where it says "Love of my Life --" 18 Yes. 19 Α. -- "dash dead game"? 20 Q. 21 Α. Yes. What does that mean? 22 Q. Exactly what it says, dead game. 23 Α.

Do you see where it says "Love of my Hood - INS"? 2.4 Ο.

Yes. 25 Α.

EXHIBIT C

PEOPLE OF THE STATE OF NEW YORK VS.

CASE NUMBER: LOWER COURT NUMBER(S): 2010BX049040 DATE OF ARREST:

49040C-2010 08/03/2010

ARREST #: DATE OF BIRTH: B10663378 02/26/1983

GREEN, BRANDEN

DEFENDANT

I HEREBY CERTIFY THAT IT APPEARS FROM AN EXAMINATION OF THE RECORDS ON FILE IN THIS OFFICE THAT ON 02/18/2011 THE ABOVE ACTION WAS DISMISSED AND ALL PENDING CRIMINAL CHARGES RELATED TO THIS ACTION WERE ALSO DISMISSED BY THE HONORABLE GREENBERG, E THEN A JUDGE OF THIS COURT.

THE DEFENDANT WAS DISCHARGED FROM THE JURISDICTION OF THE COURT.

THE ABOVE MENTIONED DISMISSAL IS A TERMINATION OF THE CRIMINAL ACTION IN FAVOR OF THE ACCUSED AND PURSUANT TO SECTION 160.60 OF THE CRIMINAL PROCEDURE LAW "THE ARREST AND PROSECUTION SHALL BE DEEMED A NULLITY AND THE ACCUSED SHALL BE RESTORED, IN CONTEMPLATION OF LAW, TO THE STATUS OCCUPIED BEFORE THE ARREST AND PROSECUTION".

PURSUANT TO SECTION 160.50(1C) OF THE CRIMINAL PROCEDURE LAW, ALL OFFICIAL RECORDS AND PAPERS RELATING TO THIS CASE ARE SEALED.

IN WITNESS WHEREOF, I HAVE HEREUNTO SET MY HAND AND AFFIXED MY OFFICIAL SEAL ON THIS DATE 07/12/2019.

EXHIBIT D

FROM: Free, Text TO: 56400054

SUBJECT: Message from 622#2013233132 DATE: 07/16/2019 03:21:46 PM

The report contains a section with the government view They gave this to her and she is repeating it. This is how it works

EXHIBIT E

BP-A0324 JUN 10

FEDERAL BUREAU OF PRISONS

WORK PERFORMANCE RATING - INMATE

Inmate's Name	Register No.	Unit
Green, Brandon	56400-054	G-A
Evaluation Period 03-20-2020-PRESENT	Work Assignment KITCHEN ORDERLY	

Bonus Justification

Inmate Green, Brandon is an outstanding orderly. Inmate Green, Brandon performs his duties with little to no supervision. Inmate Green, Brandon assists other inmates in their duties in addition to his own. Inmate Green, Brandon is an outstanding orderly who works well with others. He is well organized, dependable, timely, and always brings a positive attitude to his work.
Signature and Date of Dept. Head Approval
Route to Dept. Head for Review, Then to Unit Team
Instructions: Check the best statement in each area. Base your rating on the inmate's overall performance for the rating periodneither the immate's best day nor worst dayas compared to what is expected of a satisfactory worker in the assignment.
A. QUALITY OF WORK 1. Unsatisfactory. Makes more errors than should for this level of training. Work must be redone. 2. Fair. Careless; makes mistakes and does not check work. Should do better work. 3. Satisfactory. Makes some mistakes but no more than expected at this level. 4. Good, Makes fewer mistakes than most inmates at this level of training. Does Journeyman level work. 5. Outstanding. Does superior work
B. QUANTITY OF WORK 1. Unsatisfactory. Lazy, wastes time, goofs off. 2. Fair. Does just enough to get by. Has to be prodded occasionally. 3. Satisfactory. Works steadily but does not push self. 4. Good. Willing Worker. Does a full day's work and wastes little time. 5. Outstanding, Drives self exceptionally hard all the time.
 C. INITIATIVE 1. Unsatisfactory. Always waits to be told what to do. Needs help getting started, 2. Fair. Usually relies on others to say what needs to be done. 3. Satisfactory. Can adapt to changes in routine. Will start work without waiting to be told. 4. Good. Can plan own work well. Acts on own in most things. Doesn't wait to be told what to do. 5. Outstanding. Has good ideas on better ways of doing things.
D. INTEREST; EAGERNESS TO LEARN 1. Poor. Shows no interest in job. Regards job as a drag or waste of time. 2. Fair. Shows minimal interest but not very eager to learn. 3. Satisfactory. Shows average amount of interest. Wants to learn own job but does not put forth extra effort. 4. Good. Above-average interest in job. Asks questions about own work and related work. May do extra work to improve skills. 5. Outstanding. Eager to master job. Wants to know everything there is to know about it. May read up on own time or volunteer to do things that will improve knowledge.
 ■ ABILITY TO LEARN Poor. Has very low aptitude and is very slow to learn. Even when given extra instruction unable to learn, no matter how hard trying. Fair. Slow but if tries eventually will pick up the skills. Needs more instructions than most. Average. No slower and no faster to learn than most inmates. Requires average amount of instruction. Good. Learns rapidly. Good memory. Rarely makes the same mistake twice. Outstanding. Very quick to learn. Excellent memory. Is learning much more rapidly than most inmates assigned here. Never makes the same mistake twice.
F. NEED FOR SUPERVISION; DEPENDABILITY; SAFETY; CARE OF EQUIPMENT 1. Needs constant supervision. If left unsupervised will foul up, get in trouble, or wander off. Undependable. 2. Needs closer supervision than most. Not very dependable. 3. Average. Can be relied on for certain things but must be supervised by others. Usually prompt and dependable. 4. Needs little supervision. Good record of dependability an promptness. 5. No supervision required. Completely dependable in all things.

Replaces BP-S324, OCT 94

 G. RESPONSE TO SUPERVISION AND INSTRUCTION Poor. Resentful and hostile. May argue with supervisor. Fair. Resists or ignores suggestions. Satisfactory. Generally does what is told without any fuss. Good. No hostility or resentment. Tries to improve. Outstanding. Makes a real effort to please the instructor. Does ex 	xactly as is told.
 H. ABILITY TO WORK WITH OTHERS 1. Poor. Negativistic, hostile, annoying to others. 2. Fair. Doesn't make friends easily. Has some interpersonal difficulation. 3. Satisfactory. Gets along OK with most co-workers and is accepted. 4. Good. Friendly, congenial, helpful; others like to work with. 5. Outstanding. Gets along well with everyone. Very popular. 	
I. OVERALL JOB PROFICIENCY Based on this inmate's overall performance during this work period, in the community would you:	if this inmate was an employee of yours
 Fire or lay off that individual? Transfer the person to a less demanding job at a lower pay scale? Continue to employ the person but without a raise or promotion the same job? Raise the person's pay but keep the person at the same job? Promote the person to a more demanding job at a higher pay rate? 	? nis time?
J. GRADES AND PAY 1. Performance Pay - Grade Class (Check one) 1 2 3	4 M.
2. Hours of Satisfactory work	
3. Regular Pay	
4. Bonus Recommended:yes; no	
5. Total Pay	*
Supervisor's Signature	Date 03/20/2021
COUNSELOR R. VEGA / A / Inmate's Signature	Date 03/20/2021
Inmate was requested to sign this reason:	rating, but refused, citing the following
Staff Witness' Signature	Date

FILE IN SECTION 4 UNLESS APPROPRIATE FOR PRIVACY FOLDER

SECTION 4

EXHIBIT F



TRULINCS 56400054 - GREEN, BRANDON - Unit: BRO-G-B

FROM: 56400054 TO: Free, Text

SUBJECT: RE: Message from 622#2013233132

DATE: 06/17/2019 06:57:59 PM

your answering my question broad, it's a simple answer eric please, from the record when do you say i alledgedit came into play???not johnson not murray me??

----Free, Text on 6/17/2019 2:21 PM wrote:

You can be part of a conspiracy while in prison. This was true for Johnson and is true as a matter of law. Dates of conspiracy are in indictment and are appropriate as they can be. I sent Daly testimony. Will send law enforcement 3500

N. O. C.



TRULINCS: 56400054 - GREEN, BRANDON - Unit: BRO-G-B

FROM: 56400054 TO: Free, Text

SUBJECT: 622#2815431696 DATE: 06/18/2019 08:54:27 PM

the original indictment charges me with the made up cherry story from in or about 2011-2012, also every testiliar stated they either met me in 2011 till present, so I'm asking as you combed thoroughly threw the transcripts when is the government alleging i joined this conspiracy??its pretty simple question, I looked 3x threw the transcripts and the only one that said the saw my name allegedly in gang paperwork when he was in prison was Adams but never never stated what prison or what time it was, with him in and out of jail his entire life, other than that everyone else including him claims to have met me 2011 til present.



TRULINCS 56400054 - GREEN, BRANDON - Unit: BRO-G-B

FROM: 56400054 TO: Free, Text

SUBJECT: RE: Message from 622#2815431696

DATE: 06/19/2019 06:12:54 PM

so its 2011 to 2012??i see alot of dates their can you please help me understand..is it in the overact?

----Free, Text on 6/19/2019 5:51 PM wrote:

I received your text. The date you joined the conspiracy is listed in the Indictment

10%

TRULINCS 56400054 - GREEN, BRANDON - Unit: BRO-G-B

=ROM: Free, Text TO: 56400054

SUBJECT: Message from 622#2815431696

DATE: 06/20/2019 03:36:07 PM

I don't have a date. I would have to go back to the record.



TRULINCS 56400054 - GREEN, BRANDON - Unit: BRO-G-B

FROM: 56400054 TO: Free, Text

SUBJECT: RE: Message from 622#2815431696

DATE: 06/20/2019 12:58:23 PM

Melissa:

>

What I'm asking for is for you to please tell me - from your review of the record - what is the alleged year that I entered this conspiracy? That is all I need and am looking for: As a lawyer, I'm looing for your expertise in this matter; to review the record of the case against me here, and let me know what the year is that it is alleged that I entered into the underlying conspiracy. Now that the record is fully developed, I'm assuming that it should not be too hard to find and establish this date. Thank you very much for your time here, and have a wonderful day. Please get back to me as soon as possible with this answer--I look forward to your response.

----Free, Text on 6/20/2019 10:51 AM wrote:

I not sure I understand what you are asking or what you are trying to do. What is the date you are looking for?

100

TRULINCS 56400054 - GREEN, BRANDON - Unit: BRO-G-B

FROM: 56400054 TO: Free, Text

SUBJECT: RE: Message from 622#2815431696

DATE: 06/20/2019 07:14:52 PM

Melissa:

When do you think you can get to this for me? I understand that you are busy, but Mr. Breslin is coming to see me monday, and, I'm doing my best to get my draft put together for him. Please, if you could get back to me as soon as possible with this information; it would be extremely helpful, it is very important.thanks in advance have a gn -----Free, Text on 6/20/2019 3:36 PM wrote:

>

I don't have a date. I would have to go back to the record.



>

TRULINCS 56400054 - GREEN, BRANDON - Unit: BRO-G-B

FROM: 56400054 TO: Free, Text

SUBJECT: RE: Message from 622#2815431696

DATE: 06/22/2019 03:25:35 PM

guess you can not answer this question? ----Free, Text on 6/20/2019 10:21 PM wrote:

Brandon, the government alleged you joined the conspiracy. They alleged that you were part of the conspiracy as of 2010. There is not one specific date in the trial. And they are not required to make that showing.



TRULINCS 56400054 - GREEN, BRANDON - Unit: BRO-G-B

FROM: 56400054 TO: Free, Text

SUBJECT: RE: Message from 622#2815431696

DATE: 06/19/2019 06:23:45 PM

help me understand what date I'm looking for, because it doesn't say no where in that indictment when i personally entered the alleged conspiracy Melissa.can you please tell me the year the government or the indictment is alleging i entered?? have been writing Eric for weeks on this matter for clarity to accurately repair my drift.

----Free, Text on 6/19/2019 5:51 PM wrote:

>

I received your text. The date you joined the conspiracy is listed in the Indictment



TRULINCS 56400054 - GREEN, BRANDON - Unit: BRO-G-B

FROM: 56400054 TO: Free, Text

SUBJECT: RE: Message from 622#2013233132

DATE: 06/20/2019 07:12:46 AM

so how can we get a certain and more accurate date of allege involvement??threw the transcripts?can you have it on paper when you get here monday please??

----Free, Text on 6/19/2019 11:36 PM wrote:

>

That said I can probably figure out when your involvement is said to have begun. But it will not be a date certain.

Certifications

- 1. Department of Justice Program Column (SEE EDUCATION MASTER SHEET)
- 2. Alternative to Violence
- 3. Financial Modified Operations (SEE EDUCATION MASTER SHEET)
- 4. Recommendation from Counselor Vega (SEE EXHIBIT E)
- 5. Education Master Sheet
- 6. Associate Warden's Letter

PEED

Page 1 of 1

BROGN PAGE 001 REGISTER NO	* INMATE EDUCAT * TRANSCE : [56400-054 NAME: GREEN : TRANSCRIPT RSP OF: BRO-B	* 14:04:35 N FUNC: DIS
FACL ASSIGN	WENT DECCRIPTION	START DATE/TIME STOP DATE/TIME 01-22-2007 1845 CURRENT 01-22-2007 1845 CURRENT 01-06-2010 0836 CURRENT
SUB-FACL BRO M	DESCRIPTION ALTERNATIVE TO VIOLENCE PROJECT	START DATE STOP DATE EVNT AC LV HRS 08-06-2019 08-06-2019 P C P 3 03-15-2021 03-19-2021 P C P 5 01-21-2021 01-28-2021 P C P 4 10-05-2020 11-09-2020 P C P 12 09-25-2020 10-01-2020 P C P 8 12-09-2019 01-06-2020 P C P 10 10-15-2019 12-07-2019 P C P 14 10-11-2019 10-25-2019 P C P 9
G0002	MORE PAGES TO FOLLOW	

BROGN * INMATE EDUCATION DATA * 05-04-2021
PAGE 002 * TRANSCRIPT * 14:04:35

REGISTER NO: 56400-054 NAME..: GREEN FUNC: DIS

FORMAT....: TRANSCRIPT RSP OF: BRO-BROOKLYN MDC

~~~	EDUCATION	COURSES -			<b></b>			
SUB-FACL	DESCRIPTION	START DAT	E STOP DA	TC 1	EV/NET	^		
BRO M	INTRODUCTION TO CHESS		9 09-18-20					HRS
BRO M	BLOOD PRESSURE		9 09-03-20		P	C	•	2
BRO M	BASIC FITNESS		9 09-03-20 9 07-29-20			С	Р	8
NYM M	REFLECTIONS RELAXATION				Р	_	P	8
NYM M	PARENTING		9 04-15-20:		Р	W	I	10
NYM M	LEAD BY EXAMPLE REVERSE THE TR	07-01-201	7 09-15-20	17	P	C	P	20
NYM M	INSIDE OUT PARENTING - UNIT				P	C	P	20
NYM M	BASIC BOOKKEEPING		08-15-201	=	Р	C	P	20
EDG			07-06-201		P	C	Р	12
EDG	GED5, MWF, 12:30-2:00 PM	06-29-2009	01-29-201	.0	Р	W	I	120
MNA M	PGED6, MWF, 9:00-10:30 AM	05-11-2009	06-29-200	19	P	N :	I	18
	GED A 1200-1330 M-F	05-14-2008	03-11-200	9	PI	N :	I	166
MNA DRUG	RPP2 - JOB APPLICATIONS	10-27-2008	02-02-200	9	PV	٧ :	I	0
MNA DRUG	RPP #3: DAP-PERSONAL FINANCE	10-27-2008	02-02-200	9	P V	v -	Τ.	15
MNA DRUG	RPP #1: DAP-HEALTH	10-27-2008	02-02-200	9	Pν		<del>-</del> Г	20
C0003				-	. •	• 1	_	20

G0002 MORE PAGES TO FOLLOW . . .

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Page 1 of 1

BROGN

INMATE EDUCATION DATA

05-04-2021

PAGE 003

TRANSCRIPT

14:04:35

REGISTER NO: 56400-054

NAME..: GREEN

FUNC: DIS

FORMAT....: TRANSCRIPT RSP OF: BRO-BROOKLYN MDC

	EDUCATION C	OURSES					
SUB-FACL	DESCRIPTION	START DATE	STOP DATE	EVNT	AC	LV	HRS
	RPP #6: DAP-PERSONAL GROWTH	10-27-2008	02-02-2009	Р	W	I	40
MNA DRUG	THINKING ABOUT RIGHT AND WRONG	09-16-2008	10-28-2008	Р	C	Р	2
MNA DRUG		09-01-2008		P	C	P	30
MNA DRUG	RPP6-FISH RETURNING HOME		11-03-2008	Р	C	Р	10
MNA DRUG	UNDERSTANDING FEELING		11-04-2008	Р	С	Р	8
MNA DRUG	RPP6-FISH NONVIOLENT		10-10-2008		c	P	4
MNA DRUG	SLEEP DISORDER				c	P	2
MNA DRUG	FISH MONEY MANAGEMENT		10-28-2008		C	, P	24
MNA DRUG	RPP6-FISH DEVELOPING INSIGHT		11-03-2008		_	•	2
MNA DRUG	SELF DISCOVERY		09-25-2008		C	P	
MNA DRUG	HANDLING TOUGH TIMES		11-04-2008		C	Р	2
MNA M	RPP4-USPO/CCC RULES	07-01-2008	07-01-2008	Р	C	P	4
MNA M	RPP5-RELEASE GRATUITY/MONEY	07-01-2008	07-01-2008	P	C	Р	4
	RPP #6 - DRUG EDUCATION	06-02-2008	06-06-2008	P	C	P	32
MNA M	(PG)MGED3 1400,MED LEVEL,TU-FR	08-07-2007	03-20-2008	S P	W	ī	40
HAZ	(Laburens, Translure, Translure,						

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MORE PAGES TO FOLLOW . . .

Page 1 of 1 PEED 05-04-2021 INMATE EDUCATION DATA BROGN 14:04:35 TRANSCRIPT PAGE 004 FUNC: DIS REGISTER NO: 56400-054 NAME..: GREEN FORMAT....: TRANSCRIPT RSP OF: BRO-BROOKLYN MDC EDUCATION COURSES -----START DATE STOP DATE EVNT AC LV HRS DESCRIPTION SUB-FACL (PG)COMPUTER PARENTING PROGRAM 06-04-2007 12-07-2007 10 PCP HAZ 04-25-2007 06-21-2007 8 PCP (PG) USP WELLNESS CLASS HAZ 04-26-2007 06-21-2007 PCP 8 (PG) USP DIABETES CLASS HAZ 8 04-24-2007 06-21-2007 P C P (PG) USP ANATOMY HAZ (PG) USP NUTRITION COURSE 04-23-2007 06-21-2007 PCP 8 HAZ FORM STATE TEST FACL TEST DATE SUBTEST **SCORE** TEST FAIL MNA 08-26-2008 412.0 GED PRAC AVERAGE MNA PB 390.0 08-26-2008 LIT/ARTS EDG PD 01-25-2010 420.0 MATH EDG PD 01-25-2010 470.0 SCIENCE PD EDG 01-25-2010 390.0 SOC STUDY MNA PB 510.0 08-26-2008 WRITING

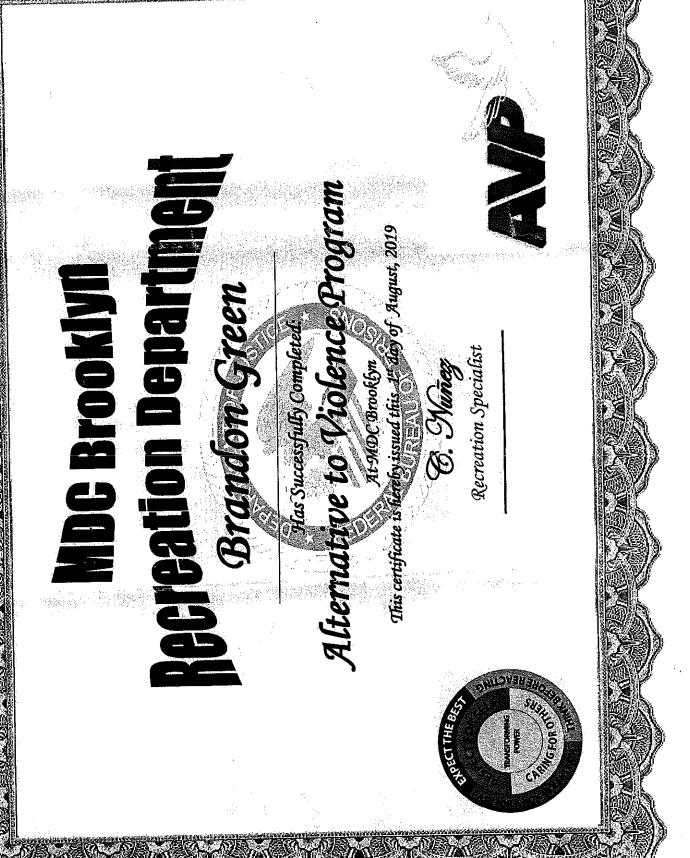
MORE PAGES TO FOLLOW . . .

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PEED  BROGN  PAGE 005 OF  REGISTER NO  FORMAT		NAME:	EDUCATION DATA RANSCRIPT  GREEN BRO-BROOKLYN M	* *	05-0- 14:0 FUNC: D	
TEST TABE D	SUBTEST  MATH APPL  MATH COMP  READING  LANGUAGE	HIGH SCORE 7.1 7.4 9.1 5.2	TEST SCORES TEST DATE 08-03-2007 08-03-2007 08-03-2007	TEST FACL HAZ HAZ HAZ HAZ	FORM 9 9 9 9	STATE

TRANSACTION SUCCESSFULLY COMPLETED - CONTINUE PROCESSING IF DESIRED

G0005





#### U.S. DEPARTMENT OF JUSTICE

#### Federal Bureau of Prisons

Metropolitan Correctional Center

ISO Park Row New York, New York 10007

April 1, 2018

MEMORANDUM FOR ALL_CONCERNED

FROM:

M. Vitale, Acting Associate Warden

SUBJECT:

**April 2018 Work Performance** 

Food Service Worker/Sanitation Orderly/ Head Orderly -- Unit 5N

GREEN, 1997 -- 56400-054

I am writing to inform you about the volunteer work done by inmate Brandon Green, Register No. 56400-054; who is housed at Metropolitan Correctional Center (MCC) in New York. Green is assigned to the 5-North work detail, and is doing an outstanding job with his assignment. Green is a remarkable worker, has an excellent rapport with staff and his fellow inmates. MCC New York recently completed an American Correctional Association (ACA) reaccreditation audit. Prior to the audit, Brandon Green was assigned to partake in additional duties to complete needed renovations on the housing unit: which included - painting and additional sanitation maintenance. He was one of the inmates chosen to work. Green spent endless hours working to get the unit ready for the inspection, and the result was good. Additionally, he is called upon on a daily basis to assist with several projects on the unit, and always maintains a positive attitude during the entire process. Along with sanitation maintenance, Brandon Green also volunteers to assist when programs are being held on the unit, and is there to help get the unit set up on time. He provides support to staff conducting the program by preparing the materials needed before and after each class. Green is the head oderly for the unit and is a food service worker as well. He does a great job multitasking 7 days a week in the kitchen detail, serving each meal. Though each task can be demanding, Green is constantly observed handling them gracefully. He ensures his time is spent productively, and is constantly observed getting the job done. From time to time, he has been assigned to work on program projects by his case manager, and is doing well in that area as well. He encourages his peers to sign up for programs, and displays a can-do attitude, even when challenges arise. As a result, they are thankful to his assistance in the areas they need help the most. Green is a valuable component to the orderly team, is very respectful and helpful all in the same tone. For these reasons mentioned, Green is being acknowledged and being recommended for a higher level of work.

